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Submission – National Direction for Exotic Afforestation, Forestry & Bioeconomy Policy Team,
Ministry for Primary Industries,
PO Box 2526,
Wellington 6140.

Email submission: mpi.forestry@mpi.govt.nz

Dear Sir/Madam

Submission on proposed changes to National Direction for Plantation and Exotic Carbon Afforestation

Thank you for the opportunity to provide comment on the discussion document “National direction for plantation and exotic carbon afforestation” regarding proposed changes to the National Environmental Standards for Plantation Forestry (NES-PF). The proposed changes extend the scope of the regulatory framework to include exotic carbon forests, improve wildfire management, and better enable foresters and councils to manage the environmental effects of forestry. We appreciate the opportunity to provide feedback on options to support councils to control the location of afforestation (plantation and exotic carbon) and to manage social, cultural, and economic effects.

Please find the West Coast Regional Council’s (WCRC or the Council) feedback attached. Council consulted with its iwi partners, Te Rūnanga o Ngāti Waewae and Te Rūnanga o Makaawhio (Poutini Ngāi Tahu or PNT), who are mana whenua on the West Coast/Tai Poutini, in the development of this submission.

Due to our high workload, we have not had time to fully consider all of the content of the discussion document. Council has therefore focussed on the key changes proposed to the NES-PF, and matters around implementing these on the West Coast.

Our contact details for service are:

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We would be grateful for acknowledgement of receipt of our submission.

Yours faithfully

A handwritten signature in black ink, appearing to read 'H. Mabin', followed by a long horizontal line extending to the right.

Heather Mabin
Chief Executive Officer

List of Feedback

1. Clarification is sought on the definition of 'exotic carbon forest'.
2. The Council supports Forest Management Plans (FMPs) for 'exotic carbon forests' being added to the NPS-PF and that FMPs clearly outline how cultural and environmental effects of exotic carbon forests will be managed.
3. Council prefers managing the social, cultural, and economic effects of plantation and exotic carbon afforestation through a local control approach. The reason for preferring the principle of subsidiarity (making decisions as close to the local community as possible) is so that the West Coast's unique context, issues and concerns can be taken into account.
4. Council considers it may be difficult to manage social and economic effects through a national regulation or a local control approach. This requires further investigation.
5. Council agrees with the Government's direction to improve wildfire risk management. All forests are subject to wildfire risk and damage.
6. Council agrees with amending the NES-PF to add a new requirement for forests over 1 hectare to have a Wildfire Risk Management Plan (WRMP). WRMPs should be prepared by foresters and audited by Fire and Emergency New Zealand (FENZ) to show third party compliance to the regional council in order to meet yet to be drafted NES-PF standards for WRMP.
7. Slash management (managing any tree waste left behind after forestry activities) is a major concern on the West Coast due to the regions high annual rainfall making slash management a priority for forest plantation sites. Regulation should clarify measures to ensure that slash is not mobilised in heavy rain and ensure contingency measures for such movement are in place.
8. The Council agrees in principle with an initial alignment with the NES-PF and NES-Freshwater to promote a cohesive approach.

Introduction

The Government has requested responses to its national direction for plantation and exotic carbon afforestation under four main parts: Part A (Managing the environmental (biophysical) effects of exotic carbon forestry); Part B (Controlling the location of afforestation (plantation and exotic carbon) to manage social, cultural and economic effects); Part C (improving wildfire risk management in all plantation and exotic carbon forests); and Part D (addressing matters identified through the Year One Review of the National Environmental Standards for Plantation Forestry (NES-PF)).

Council agrees that there are some potential gaps in the NES-PF for managing the environmental (biophysical) effects of exotic carbon forests and transitional forests, and that these gaps can cause inconsistent forestry management with poor environmental effects, e.g., where:

- exotic carbon forests have the same, or similar, effects to those of plantation forests but are not subject to the same standards;
- the purpose and intent of a forest changes over time creating a regulatory gap, e.g., when an exotic forest transitions to an indigenous forest; and
- there is uncertainty about future environmental issues that could arise over decades, as exotic carbon forests transition to indigenous forest or are grown to the end of their natural lifespan e.g., long term stability.

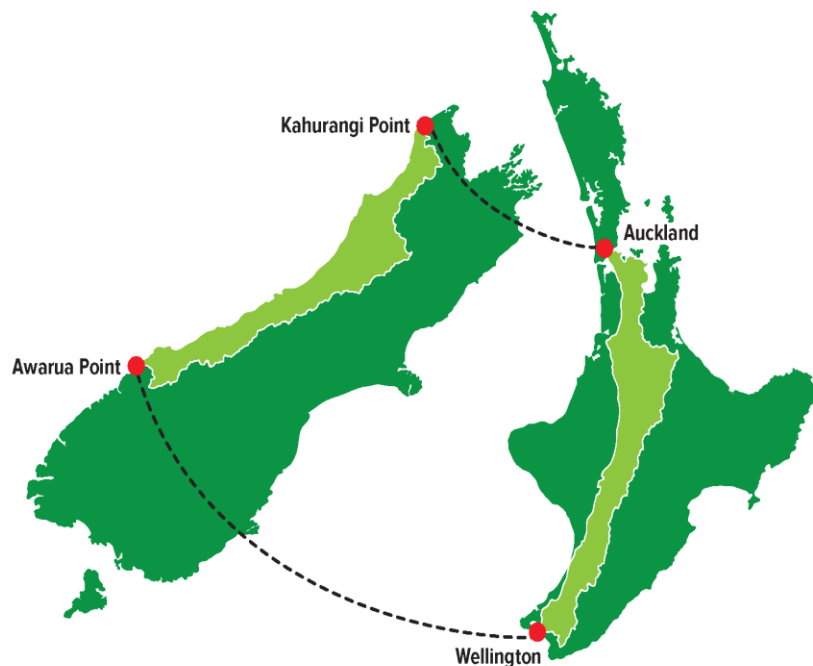
In general, Council opposes exotic carbon forests due to their social and economic impact. Exotic carbon forests risk social and economic impacts in rural communities that will result in land areas being 'locked up' for forestry and opportunities for other development being constrained. There are limited economic benefits of forestry for a local community and few job opportunities. This has a flow on effect to the community including, but not limited to, loss of social connection, decreasing school rolls, and a shrinking pool of volunteers for key roles (emergency response) and social services. There can also be a subsequent loss of population-based funding for the community, such as health services and education.

Our submission responds to the issues directly impacting the West Coast region.

About the Submitter

The West Coast Regional Council (WCRC) is the local authority for a region covering a vast area with a sparse population. Extending from Kahurangi Point in the north to Awarua Point in the south, this is the approximate distance from Wellington to Auckland.

Map of New Zealand to highlight 600km length of West Coast Region compared to distance between Auckland and Wellington



The West Coast region stretches the equivalent distance of that between Auckland and Wellington

The West Coast is predominantly rural.

The Conservation Estate comprises 84.17% of the West Coast land area, with an additional 1.55% administered by Land Information New Zealand (LINZ). This leaves 14.28% of land available for private ownership. The land in the Conservation estate and Crown ownership is not rateable by local authorities.

Primary industries account for 23% of the Region’s economy with wood product manufacturing, forestry and logging collection contributing 1.3% to total West Coast GDP. Forestry and Logging contributed \$6.93M to the West Coast GDP in 2021¹. In terms of employment, in 2021, this meant 84 jobs for the West Coast region, down 13 from 2020.

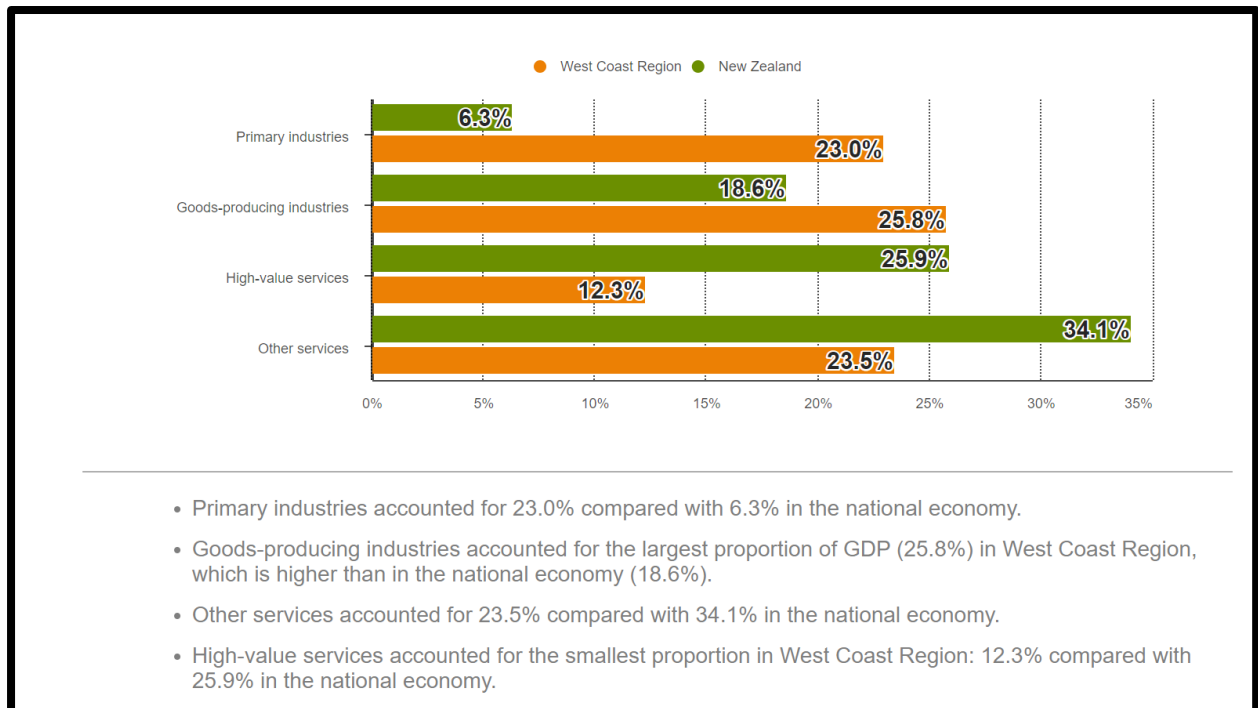


Figure 1 West Coast Annual Economic Profile 2021 Share of total GDP. Source: Infometrics

The Tai Poutini West Coast 2050 Strategy seeks to develop the Food and Fibre Sector through Optimisation, and states:

“The West Coast has an extensive and diverse range of food and fibre businesses drawn from an assorted cross-section of agriculture, horticulture, forestry and carbon farming, aquaculture, meat, and food processing, as well as related agricultural service industries.

Actions

- *Developing opportunities to support and grow our food and fibre sector on the West Coast through increased investment in innovation*
- *Developing a food and fibre provenance story for the West Coast that supports increased value from the sector*
- *Establishing partnerships for land use trials to position the West Coast as a preferred option for science and research”*

¹ Source Infometrics at <https://ecoprofile.infometrics.co.nz/West%20Coast%20Region/PDFProfile#h6>

The Council works closely with the regions' three territorial authorities (the Buller, Grey, and Westland District Councils). Outside of the main towns of Westport, Greymouth, Reefton and Hokitika, the region's relatively low population of approximately 32,600 is spread across smaller settlements and rural communities. It is important that any changes to the NES-PF regarding plantation and exotic carbon afforestation are beneficial to the social, economic, and cultural well-being of all West Coast communities and the natural environment.

Te Rūnanga o Ngāti Waewae and Te Rūnanga o Makaawhio (Poutini Ngāi Tahu – PNT) are mana whenua of Te Tai o Poutini (the West Coast). Our Mana Whakahono ā Rohe (Resource Management Act - Iwi Participation Arrangement) captures the intent of the Council and Poutini Ngāi Tahu to progress our relationship in accordance with the Treaty of Waitangi partnership between iwi and the Crown.

It should be noted that Ngāi Tahu Forestry is the largest exotic production forestry operator on the West Coast.

Council Responses to Discussion Document Questions

Part A. Question A3: Do you agree that the environmental effects of exotic carbon forests should be managed through the National Environmental Standards for Plantation Forestry, NES-PF?

The Council does not support or oppose adding a new category for exotic carbon forests to the NES-PF. There are a number of terms in the discussion document, and staff are unclear as to what the term 'exotic carbon forest' covers. Clarification is sought for the definition of 'exotic carbon forest'.

Feedback 1

Council supports Government defining the meaning and parameters of 'exotic carbon forest' but reserves its decision as to a new category until a definition of 'exotic carbon forest' is provided.

As to specific provisions for managing exotic carbon forests, the Council supports Forest Management Plans (FMPs) for 'exotic carbon forests' being added to the NPS-PF and that FMPs clearly outline how cultural and environmental effects of exotic carbon forests will be managed. There is a current requirement in the NES-PF for management plans to be prepared for earthworks, forestry quarrying and harvesting to enable site specific environmental risks to be identified and managed up-front. Requiring a

management plan for exotic carbon forests will also help ensure that carbon forest management is treated the same or similar to management of plantation forests for harvest.

Feedback 2

The Council supports Forest Management Plans (FMPs) for ‘exotic carbon forests’ being added to the NPS-PF, and suggests that FMPs clearly outline how environmental effects of exotic carbon forests will be managed.

The Council supports that the cumulative environmental impacts of exotic carbon forests on downstream land uses be regulated by the NES-PF and managed by Forest Management Plans. This should include clearance of debris from windthrow or mortality and waste material from timber felling being washed downstream.

Part B. Question B4: What is your preferred option for managing the social, cultural, and economic effects of plantation and exotic carbon afforestation? Select from list: Option 1 (a local control approach); Option 2 (a consent requirement through national direction); No preference; I do not support either of these options. Why?

Feedback 3

Council prefers managing the social, cultural, and economic effects of plantation and exotic carbon afforestation through a local control approach. The reason for preferring the principle of subsidiarity (making decisions as close to the local community as possible) is so that the West Coast’s unique context, issues and concerns can be taken into account.

Part B. Question B5: How effective would option 1 (a local control approach to managing the location of plantation and exotic carbon afforestation) be in managing the social, cultural, and economic effects of plantation and exotic carbon afforestation? [select from a range/scale not effective – highly effective]. Why?

Existing regulatory controls for locational effects of afforestation for exotic carbon forests, such as, outstanding natural landscapes, visual amenity landscapes, and significant natural areas are contained in district plan rules; whereas environmental effects associated with water bodies and exotic carbon forests are provided for by the National Policy Statement for Freshwater Management, Regional Policy Statements and Regional Plans. It could be difficult to control locational effects for exotic carbon forests through a universal NES-PF. On the West Coast, locating exotic carbon forest in more remote areas away from rural communities is difficult as such areas are public conservation land where exotic forest is unlikely to be allowed. Also, locational effects and social, cultural, and economic effects could be considered when a Regional Spatial Strategy is developed for the West Coast under the new Natural and Built Environment Act. Overall though, Council is sceptical that it can control the social, cultural, and economic effects of forestry plantation.

Feedback 4

Council considers it may be difficult to manage social and economic effects through national regulation or local control approaches. This requires further investigation.

Part C: Question C1: *Do you agree that wildfire risk management plans (WRMPs) should be included in the NES-PF?*

Management of wildfires can be addressed by adding a provision to the NES-PF for a Wildfire Risk Management Plan (WRMP). However, management of wildfires should remain the mandate of the Fire and Emergency New Zealand Act. Under the Fire and Emergency New Zealand Act, Fire and Emergency New Zealand (FENZ) must prepare and issue fire plans for each local area, including policies and procedures for fire control.

Exotic carbon forests should be subject to the same Service Level Agreements for Wildfire Risk Management with FENZ as plantation forests (for harvest). Carbon forests may have higher wildfire risk if they are not managed for ladder fuels, debris, and access. These management requirements should be provided for in Wildfire Risk Management Plans and subject to Service Level Agreements.

Feedback 5

Council agrees with the Government's direction to improve wildfire risk management. All forests are subject to wildfire risk and damage.

Feedback 6

Council agrees with amending the NES-PF to add a new requirement for forests over 1 hectare to have a Wildfire Risk Management Plan (WRMP). Wildfire Risk Management Plans should be prepared by foresters and audited by FENZ to show third party compliance to the regional council in order to meet yet to be drafted NES-PF standards for WRMP.

Part D: Questions D1-D4, *Questions on wilding conifer risk management.*

Council considers that wilding conifer spread (trees that have self-established away from their planted parent tree) is not a significant issue on the West Coast at this time. The West Coast does not have the very large exotic plantation forests that are found in the Canterbury and Waikato Regions. Land adjoining exotic plantation forestry is often native bush on public conservation land. Wilding pines do not establish as easily on the West Coast compared to other regions.

Part D: Questions D5-D7, *Questions on slash management.*

Question D5: Do you agree with each of the proposed amendments to the NES-PF in relation to slash regulations, set out in Table 4?

Slash management (managing any tree waste left behind after forestry activities) is a major concern on the West Coast due to the high annual rainfall, increasing the risk of surface water runoff on forestry land washing slash into nearby creeks and rivers, or down sloping land, causing creek blockages and sediment runoff. Slash management is therefore a priority for forest plantation sites for this region.

Feedback 7

Regulation should clarify measures to ensure that slash is not mobilised in heavy rain and ensure contingency measures for such movement are in place.

Council believes permanent forestry should also be managed to deliver reduced risk of debris fall and natural land subsidence.

Council believes greater flexibility is required as to how permanent forest areas are managed to provide for sustainable harvest, wind-blown harvest, and under-storey management. West Coast waterways are frequently impacted by timber debris entering rivers during periods of heavy rainfall. As the rivers clog with wood debris, flow capacity is compromised resulting in the damming of waterways, which when released, have significant impact on downstream structures (roads, bridges and stopbanks) and land. This issue has become more prominent since the selective logging of permanent native forested areas ceased and significant weather events such as ex-tropical cyclones Ita and Fehi damaged forests across the region. Wind-blown timber and ageing trees falling, affecting land stability, is an issue which will be felt for many years to come.

Windfall removal is also important in the management of permanent forests and exotic carbon forests.

Part D: Questions D8-D9, *Questions on Initial Alignment with the NES-Freshwater.*

Question D9. Do you anticipate any unintended consequences from this proposal to align parts of the NES-PF with the NES-Freshwater?

Council supports in principle aligning NES-PF provisions with the NES-Freshwater to avoid confusion for readers. It makes sense for these two NESs to be consistent with each other.

Feedback 8

The Council agrees in principle with an initial alignment between the NES-PF and NES-Freshwater in order for a cohesive approach.

This ends our submission.